

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

**JOINT MOTION TO MODIFY PRETRIAL DEADLINES AND ACCEPT
STIPULATIONS**

Williams Plaintiffs, *NAACP* Plaintiffs, Legislative Defendants, and State Defendants (collectively, “Parties”) respectfully move the Court to (1) modify the pretrial deadlines set forth in its May 23, 2024 Notice of Hearing, ECF No. 50 (“Notice”), for the exchange of deposition designations and the submission of proposed findings of fact and conclusions of law and (2) accept certain stipulations between the Parties.

Pursuant to the Notice, the current deadline to exchange deposition designations as part of the parties’ Rule 26(a)(3) pretrial disclosures is May 16, 2025, and the current deadline for objections to pretrial disclosures is May 30, 2025. The Parties intend to make all witnesses whose testimony they will rely on available to testify at trial and wish to reserve deposition designations for any witnesses who become unavailable due to unforeseen circumstances. Such unforeseen circumstances may not become apparent until the end of trial. Therefore, the Parties request that deposition designations for witnesses who become unavailable for trial be due by July 11, 2025, and objections and counter-designations for deposition designations are due by July 18, 2025. This modification will not affect the May 16, 2025 deadline for other pretrial disclosures or the May 30, 2025 deadline for objections to pretrial disclosures.

Pursuant to the Notice, the current deadline for proposed findings of fact and conclusions of law is May 27, 2025. The Parties believe that submitting proposed findings of fact and conclusions of law post-trial will result in more fulsome submissions and better aid the Court in resolution of the consolidated cases. Therefore, the Parties request that the Court vacate the May 27, 2025 deadline for pre-trial proposed findings of fact and conclusions of law and instead set a post-trial deadline for proposed findings of fact and conclusions of law. The Parties suggest that the specific deadlines for post-trial findings of

fact and conclusions of law be discussed during the requested pre-trial conference or at the beginning of trial. *See* Joint Mot. to Schedule Pretrial Conf., ECF No. 111. This modification will not affect the May 27, 2025 deadline for trial briefs.

The Parties have also conferred and wish to notify the Court of agreement regarding the following stipulations.

- The Parties stipulate to the authenticity of information on the North Carolina State Board of Elections, the United States Census Bureau, and the North Carolina General Assembly websites.
- The Parties stipulate that if an expert witness testifies live at trial, that expert's full reports will be admitted as exhibits, subject to any Daubert challenges.

All Parties have conferred and join in this motion. The Parties respectfully request that the Court grant the modifications pertaining to deadlines for deposition designations and proposed findings of fact and conclusions of law and accept the Parties' stipulations described herein. A proposed order is submitted with this Motion.

Dated: May 9, 2025

Respectfully Submitted,

/s/ Lalitha D. Madduri

/s/ Phillip J. Strach

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** Special Appearance pursuant to
Local Rule 83.1(d)*

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**Appeared via Special Notice*

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*Appearing in this matter by Special
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CERTIFICATE OF SERVICE

I certify that on May 9, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Lalitha D. Madduri
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